

State of Alabama

County of Livingston

**AFFIDAVIT**

My name is Thomas Douglas. I am the widower and former husband of Seberra Gayle Douglas who was born April 19, 1947. She was diagnosed with non-small cell carcinoma of the left lung on July 30, 2004. After suffering for over a year, Gayle died as a result of the non-small cell carcinoma, which had metastasized, on September 7, 2005.

I am familiar with Gayle's residences for most of her adult life. She resided in the Flora/Lockhart area during most of her life. She attended the Flora City school which was located less than one mile from the Louisiana Pacific facility in Lockhart. As an adult, Gayle lived at 1907 Poplar Street, Flora, AL during the 1980's and 1990's.

She was not employed by any of the owners or operators of the Louisiana-Pacific wood treatment facility. I had no suspicion and Gayle had no knowledge or any reason to suspect that the chemicals from the Louisiana-Pacific wood treatment facility caused her illness and death. I now believe that the chemicals which were released into the

environment at the Louisiana-Pacific facility caused Gayle's illness and death. I know of no other hazardous or toxic chemicals that would have caused his death. Neither I nor Gayle Douglas knew that the chemicals which were released into the environment from the Louisiana-Pacific facility caused or promote cancer.



THOMAS DOUGLAS

Sworn to and subscribed before me this 10 <sup>2006</sup> day of April,  
2006.



Wendy W. Allen  
NOTARY PUBLIC

My Commission Expires: 9-13-08

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